



**INTERNATIONAL SAFETY STANDARDS
REFERENCE GUIDE FOR THE JUVENILE
PRODUCTS INDUSTRY**



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JUVENILE PRODUCTS (1/2)

INTERNATIONAL SAFETY STANDARDS & REGULATIONS SUMMARY

REQUIREMENT	USA	EUROPE	CANADA
TRANSPORT			
Wheeled child conveyances/ carriages and strollers	ASTM F833/16 CFR 1227	EN 1888	SOR/2016-167
Rain covers	–	NF S54-043	–
Baby carriers & slings	<ul style="list-style-type: none"> ■ ASTM F2236/16CFR1226 ■ ASTM F2549/16CFR1230 ■ ASTM F2907/16CFR1228 (proposed rule) 	<ul style="list-style-type: none"> ■ EN 13209-1 ■ EN 13209-2 ■ TR 16512 	–
Child seats for cycles and bicycle trailers	ASTM F1625	<ul style="list-style-type: none"> ■ EN 14344 ■ EN 15918 	–
Child restraint systems (car seats), hand-held infant carriers	<ul style="list-style-type: none"> ■ 49 CFR 571.213 ■ ASTM F2050/16 CFR 1225 	<ul style="list-style-type: none"> ■ ECE44/I-SIZE UNR129 ■ EN 12790 	CMVSS 213
SLEEPING			
Cots and folding cots/ non-full-size and full-size baby cribs	<ul style="list-style-type: none"> ■ ASTM F1169/16 CFR 1219 ■ ASTM F406/16 CFR 1220 ■ ASTM F2710 	<ul style="list-style-type: none"> ■ EN 716-1 ■ EN 716-2 	SOR/2016-152
Cribs and cradles/bassinets	ASTM F2194/16 CFR 1218	<ul style="list-style-type: none"> ■ EN 1130-1 ■ EN 1130-2 	SOR/2016-152
Bedside sleepers	ASTM F2906/16 CFR 1222	–	–
Inclined sleep products	ASTM F3118		
Junior beds/toddler beds/ rest beds	ASTM F1821/16 CFR 1217	<ul style="list-style-type: none"> ■ BS 8509 ■ NF D60-300-4 ■ NFS 54-045 	–
Carrycots (and stands), Moses baskets (bassinets)	<ul style="list-style-type: none"> ■ ASTM F2194 /16 CFR 1218 ■ 16 CFR 1225 	EN 1466	SOR/2016-152
Crib mattresses	ASTM F2933	<ul style="list-style-type: none"> ■ BS 1877-10 ■ XPD 64-011 ■ prEN 16790 (draft) 	–
Children’s sleep bags	CPAI 75	<ul style="list-style-type: none"> ■ BS 8510 ■ XPG 30-106 ■ prEN 16781 (draft) 	–
Cot bumpers	ASTM F1917	<ul style="list-style-type: none"> ■ XPG 30-106 ■ BS 1877-10 ■ prEN 16780 (draft) 	–
Baby positioners	–	XP G30-106	–
Bunk beds	ASTM F1427/16CFR1513	<ul style="list-style-type: none"> ■ EN 747-1 ■ EN 747-2 	
Duvets for children		prEN 16779 (draft)	

AUSTRALIA	INTERNATIONAL	CHINA	BRAZIL
AS/NZS 2088/CPN No.8	–	GB 14748 China Compulsory Certification (CCC) required	NBR 14389/Ordinance 315
–	–	–	–
–	–	–	–
–	–	–	–
AS/NZS 1754	–	GB 27887, China Compulsory Certification (CCC) required	NBR 14400
<ul style="list-style-type: none"> ■ AS/NZS 2172/CPN No.6 ■ AS/NZS 2195/CPN No.4 	<ul style="list-style-type: none"> ■ ISO 7175-1 ■ ISO 7175-2 	QB 2453	<ul style="list-style-type: none"> ■ NBR 15860-1 and 2/ Ordinance 243, 594 and 53
AS/NZS 4385	–	GB 30004	–
–	–	–	–
–	–	–	–
–	–	–	–
AS/NZS 8811.1	–	–	NBR 13579-1
–	–	–	–
–	–	–	–
–	–	–	–
–	–	–	–
–	–	–	–

JUVENILE PRODUCTS (2/2)

INTERNATIONAL SAFETY STANDARDS & REGULATIONS SUMMARY

REQUIREMENT	USA	EUROPE	CANADA
SITTING			
High chairs	ASTM F404	EN14988-1 EN14988-2	-
Children chairs and stools	ASTM F2613	<ul style="list-style-type: none"> ■ NF D60-300-1 ■ NF D60-300-2 ■ FIRA-FRQG C001 & C002 	-
Portable hook-on chairs	ASTM F1235/16 CFR 1233	EN 1272	-
Booster seats	ASTM F2640	EN 16120	-
Reclined cradles/ infant bouncer seats/infant/ toddler rockers	<ul style="list-style-type: none"> ■ ASTM F2167 ■ ASTM F3084 ■ ASTM F3118 	EN 12790	-
Infant swings	ASTM F2088/16 CFR 1223	EN 16232	-
CLEANING			
Changing units	<ul style="list-style-type: none"> ■ ASTM F2388 ■ ASTM F2285 	<ul style="list-style-type: none"> ■ EN 12221-1 ■ EN 12221-2 	-
Dressers, storage furniture units	ASTM F2057	EN 14749	-
Bathing aids for babies, bath seats, bathtubs	<ul style="list-style-type: none"> ■ ASTM F1967/16 CFR 1215 ■ ASTM F2670 /16 CFR 1234 	<ul style="list-style-type: none"> ■ XP S54-044 ■ XP S54-048 ■ prEN 17022 (draft) 	-
Bath thermometers		NF S54-042	-
EARLY LEARNING			
Baby walking frames/ infant walkers	ASTM F977/16 CFR 1216	EN 1273	-
Baby bouncers/swings	ASTM F2088	EN 14036	-
Stationary activity centres	ASTM F2012	-	-
Toy chests	ASTM F963	-	-
Tables for children	-	<ul style="list-style-type: none"> ■ NF D60-300-1 ■ NF D60-300-3 ■ FIRA-FRQG C001 & C003 	-
PHYSICAL PROTECTION			
Playpen/play yards/ expandable enclosures	ASTM F406/16 CFR 1221	EN12227	SOR/2016-189
Safety gates/expansion gates	ASTM F1004	EN 1930	SOR/2016-179
Bed guard/portable bed rails	ASTM F2085/16 CFR 1224	BS 7972	-
Harnesses and reins	-	EN 13210	-
FEEDING & ACCESSORIES			
Soothers/pacifiers	ASTM F963/16 CFR 1511	EN 1400	SOR/2016-184
Drinking equipment/baby bottles	-	<ul style="list-style-type: none"> ■ EN 14350-1 ■ EN 14350-2 	-
Cutlery and feeding utensils	-	EN 14372	-
Soother holders	-	EN 12586	-

Table 1

AUSTRALIA	INTERNATIONAL	CHINA	BRAZIL
AS/NZS 4684	<ul style="list-style-type: none"> ■ ISO 9221-1 ■ ISO 9221-2 	GB 22793	<ul style="list-style-type: none"> ■ NBR 15991-1 and 2/ Ordinance 683
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	GB 14749, China Compulsory Certification (CCC) required	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	GB 29281	-
-	-	-	-
-	-	-	-
-	-	GB 23159	-
AS/NZS 2432	-	GB 28482	NBR 10334
-	-	ZWX/QLB0201	NBR 13793
-	-	-	-
-	-	-	NBR 15260

JUVENILE PRODUCTS (1/2)

INTERNATIONAL CHEMICAL REQUIREMENTS

A business' success depends on having quality products. Products for children, including juvenile products, are among the most highly regulated consumer products in today's marketplace. The need to manufacture juvenile products that meet modern-day global regulatory and industrial standards is undoubtedly competitive and of paramount importance.

The use of chemical substances plays an important role in determining the unique features and distinct characteristics in the manufacture of juvenile products. Children are especially vulnerable so parents and care givers want to be confident that the chemical substances in the juvenile products that they purchased conform to destination market requirements.

EUROPEAN UNION

Juvenile products destined for the European Union (EU) are obliged to comply with EU and specific member state legislation and requirements for chemicals. The most prominent of these are:

- I. Batteries Directive 2006/66/EC
- II. Food contact [Regulation (EC) 1935/2004]
- III. General Product Safety Directive 2001/95/EC
- IV. Persistent Organic Pollutants [POPs, Regulation (EC) 850/2004]
- V. Quality EN standards for specific juvenile products (Table 2)
- VI. Registration, Evaluation, Authorisation and Restriction of Chemicals [REACH, Regulation (EC) 1907/2006]
 - a. Restricted substances (ANNEX XVII)
 - b. Substances of very high concern (SVHCs) on Candidate List
- VII. RoHS Recast (Electrical products, Directive 2011/65/EC)

Representative chemical requirements and standards for juvenile products destined for the EU are in Tables 2 and 3.

EUROPEAN UNION AND MEMBER STATE REQUIREMENTS (REPRESENTATIVE EXAMPLES)		
ITEM	STANDARD	STANDARD NAME
1	EN 12586:2007+A1:2011	Child use and care articles Soother holder Safety requirements and test methods
2	EN 1400:2013+A1:2014	Child use and care articles Soothers for babies and young children Safety requirements and test methods
3	EN 14350-2:2004	Child use and care articles Drinking equipment Part 2: chemical requirements and tests
4	EN 14372:2004	Child use and care articles Cutlery and feeding utensils Safety requirements and tests

Table 2

EUROPEAN UNION AND MEMBER STATE REQUIREMENTS (REPRESENTATIVE EXAMPLES)			
ITEM	CITATION	SUBSTANCE	SCOPE
1	Regulation (EU) 519/2012 (POPs)	Short Chain Chlorinated Paraffins (SCCPs)	Consumer products
2	Regulation (EU) 2016/293	Hexabromocyclododecane (HBCDD)	Consumer products
3	REACH ANNEX XVII	Azo dyes	Leather and textiles in direct and prolonged contact with skin
4	REACH ANNEX XVII	Cadmium	<ul style="list-style-type: none"> ■ Certain plastics ■ Paint on painted articles ■ Metal jewellery
5	REACH ANNEX XVII	Chromium (VI)	Articles containing leather parts coming into contact with skin
6	REACH ANNEX XVII	Dimethyl fumarate (DMFu)	Articles or parts thereof
7	REACH ANNEX XVII	Lead	<ul style="list-style-type: none"> ■ Jewellery ■ Articles for the general public or accessible parts thereof which may be placed in the mouth by children
8	REACH ANNEX XVII	Nonylphenol Ethoxylates (NPEs/NPEOs)	Textile-containing articles
9	REACH ANNEX XVII	Organotins	<ul style="list-style-type: none"> ■ Articles ■ Mixtures
10	REACH ANNEX XVII	Polycyclic Aromatic Hydrocarbons (PAHs)	Rubber or plastic components in articles that come into direct and prolonged or short-term repetitive contact with the human skin or the oral cavity
11	REACH	Substances of Very High Concern (SVHCs) on Candidate List	Consumer products
12	Austria ■ National Gazette II 327/2011	Bisphenol A (BPA)	Soothers (pacifiers) and teethers
13	Denmark ■ Statutory Order 855 of 5 September 2009	Phthalates	Toys and childcare articles for children aged 0-3 years
14	France ■ Act 2010-729	Bisphenol A (BPA)	Baby bottles
15	France ■ Act 2012-1442	Bisphenol A (BPA)	<ul style="list-style-type: none"> ■ Food contact materials and articles ■ Soothers and teethers
16	Germany ■ German Committee on Product Safety (Ausschuss für Produktsicherheit, AfPs), August 2014	Polycyclic Aromatic Hydrocarbons (PAHs)	Articles
17	Member states (Austria, Finland, Germany, Netherlands, Norway)	Formaldehyde	Textiles
18	Member states (Austria, Denmark, Germany and Sweden)	Formaldehyde	Wood-based panels
19	Member states (Austria, Denmark, Germany, Netherlands, Norway)	Pentachlorophenol (PCP)	Consumer products

Table 3

JUVENILE PRODUCTS (2/2)

INTERNATIONAL CHEMICAL REQUIREMENTS

USA

Juvenile products destined for the US are required to meet applicable federal, state and local government laws. Under the US Consumer Products Safety Improvement Act of 2008 (CPSIA), the majority of juvenile products are obligated to comply with each of the following applicable safety rules:

- I. Phthalates (toys and childcare articles)
- II. Total lead content
 - a. Accessible substrates
 - b. Paint and similar surface coating materials
- III. Consumer Products Safety Commission (CPSC, Durable infant and nursery products)
- IV. CPSC-accepted Third-Party Testing and component part testing
- V. Federal Hazardous Substances Act (FHSA)
- VI. Food and Drug Administration (FDA)
- VII. Manufacturer or importer to issue a Children's Product Certificate (CPC) based on point IV. above
- VIII. Product registration card (durable infant and nursery products)
- IX. Periodic testing to ensure ongoing compliance
- X. Tracking label permanently affixed to product and its packaging, if practical

Representative examples of chemical requirements for juvenile products destined for the US are in Table 4.

OTHER INTERNATIONAL LEGISLATION AND STANDARDS (REPRESENTATIVE EXAMPLES)

- I. Australian Consumer Law (ACL)
- II. Canada Consumer Product Safety Act (CCPSA) e.g.
 - Consumer products containing lead (contact with mouth) regulations (SOR/2010-273)
 - Infant feeding bottle nipples regulations (SOR/2016-180)
 - Pacifiers regulations (SOR/2016-184)
 - Phthalates regulations (SOR/2016-188)
 - Regulations amending Schedule 2 to the CCPSA (TCEP) (SOR/2014-79)
 - Surface coating materials regulations (SOR/2016-193)
- III. China GB standards e.g.
 - GB 28007 'General Technical Requirements for Children's Furniture'
 - GB 14747 'Safety Requirements for Child Tricycles'
 - GB 14748 'Safety Requirements for Wheeled Child Conveyances'
 - GB 28477 'Safety Technical Requirements for Children's Umbrella'
 - GB 30002 'Child's Toothbrushes'
- IV. Korea Quality Management and Safety Control of Industrial Products Act
 - Childcare articles (formaldehyde)
 - Children's products (lead, cadmium, nickel release, phthalates)

US FEDERAL, STATE AND COUNTY LEGISLATION (REPRESENTATIVE EXAMPLES)			
ITEM	CITATION	SUBSTANCE	SCOPE
1	Federal <ul style="list-style-type: none"> US Public Law 110-314, (Consumer Product Safety Improvement Act of 2008 (CPSIA)) 	Lead content	<ul style="list-style-type: none"> Paints and similar surface coating materials Substrates
2		Phthalates (1)	Toys and childcare articles
3	Federal <ul style="list-style-type: none"> Formaldehyde Standards for Composite Wood Products Act 	Formaldehyde emissions in composite wood	Composite wood products, furniture and other products made from HWPW-CC, HWPW-VC, PB, MDF, thin-MDF (2)
4	California <ul style="list-style-type: none"> Chapter 11, Part 3 of Division 104 of the Health and Safety Code (Chapter 672, AB 1108, 2007) 	Phthalates (1)	Toys and childcare articles
5	California <ul style="list-style-type: none"> Proposition 65 (Prop 65) 	Prop 65 list of chemicals	Consumer products
6	California <ul style="list-style-type: none"> Airborne Toxic Control Measure (ATCM) 	Formaldehyde emissions under California Air Resources Board (CARB)	Composite wood products, furniture and other products made from HWPW-CC, HWPW-VC, PB, MDF, thin-MDF (2)
7	Illinois <ul style="list-style-type: none"> Lead Poisoning Prevention Act (LPPA) 	Lead content	<ul style="list-style-type: none"> Paint on toys Childcare articles Children's jewellery
8	State laws <ul style="list-style-type: none"> Maryland, New York and Vermont 	Tris(1,3-dichloro-2-propyl) phosphate (TDCPP) and tris(2-chloroethyl) phosphate (TCEP)	<ul style="list-style-type: none"> Childcare articles and toys for children under the age of 3 (Maryland and New York) Children's products and residential upholstered furniture (Vermont)
9	Vermont 'An Act relating to Regulation of Toxic Substances'	Chemicals of high concern to children (CHCCs)	Products for children under the age of 12
10	Washington RCW Chapter 70.240 (Children's Safe Products Act (CSPA))	<ul style="list-style-type: none"> Chemicals of high concern to children (CHCCs) Lead, cadmium and phthalates (1) 	Children's products
11	State laws <ul style="list-style-type: none"> California, Hawaii, Illinois, Maine, Maryland, Michigan, Minnesota, New York, Oregon, Rhode Island, Vermont, Washington, Washington DC 	Brominated flame retardants	Consumer products
12	State, city and county laws <ul style="list-style-type: none"> California, City of Chicago, Connecticut, Delaware, Illinois, Maine, Maryland, Massachusetts, Minnesota, Multnomah County (Oregon), Nevada, New York, Vermont, Washington, Washington DC, Wisconsin 	Bisphenol A (BPA)	<ul style="list-style-type: none"> Scope of restriction in food contact materials and articles dependent on jurisdiction New York State also regulates pacifiers
13	Maine 'Toxic Chemicals in Children's Products'	Priority chemicals	Scope of products dependent on priority chemicals
14	Oregon 'Toxic-Free Kids Act', Chapter 786 (2015)	High-priority chemicals of concern (HPCCs)	Children's products
15	New York County Laws <ul style="list-style-type: none"> Albany, Suffolk, Westchester 	Hazardous chemicals	Children's products
16	Washington Chapter 176 (2016)	HBCCD, TBBPA, TDCPP, TCEP	<ul style="list-style-type: none"> Children's products Residential upholstered furniture
17	Washington DC Act 21-336	TCEP, TDCPP	Consumer products

Table 4

(1) Phthalates (BBP, DBP, DEHP, DIDP, DINP and DNOP)

(2) Hardwood Plywood-Composite Core (HWPW-CC), Hardwood Plywood-Veneer Core (HWPW-VC), Particleboard (PB), Medium-Density Fibreboard (MDF), Thin-Medium Density Fibreboard (thin-MDF)

TOYS AND JUVENILE PRODUCTS

HEAVY METALS APPLICABLE REQUIREMENTS

COUNTRY	USA		EUROPE	
STANDARDS	CPSC (CPSIA)	ASTM F963-11	EN 71-3 (2009/48/EC) for juvenile products ⁽⁴⁾	EN 71-3 (88/378/EEC) for juvenile products ⁽³⁾
LEAD IN SUBSTRATES	100 (T)	–	–	–
MATERIALS	Coatings	Toy materials other than modelling clay	Scraped off toy material (Category 3) ⁽¹⁾	Toy materials other than modelling clay
REQUIREMENTS	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)
Antimony (Sb)	–	60	560	60
Arsenic (As)	–	25	47	25
Barium (Ba)	–	1,000	18,750	1,000
Cadmium (Cd)	–	75	17	75
Chromium Cr (III)	–	60 (Cr)	460	60 (Cr)
Chromium Cr (VI)	–	–	0.2	–
Lead (Pb)	90 T	90 T/90	160	90
Mercury (Hg)	–	60	94	60
Selenium (Se)	–	500	460	500
Aluminium (Al)	–	–	70,000	–
Boron (B)	–	–	15,000	–
Cobalt (Co)	–	–	130	–
Copper (Cu)	–	–	7,700	–
Manganese (Mn)	–	–	15,000	–
Nickel (Ni)	–	–	930	–
Strontium (Sr)	–	–	56,000	–
Tin (Sn)	–	–	180,000	–
Organic tin	–	–	12	–
Zinc (Zn)	–	–	46,000	–

Table 5

All requirements are soluble content except those with T (Total Content)
 * Methodology for soluble elements differs from EN 71-3

TPEs: Thermoplastic Elastomers

			CANADA	AUSTRALIA
EN 1400:2013+A1:2014 soothers	EN 12586 soother holders	EN 14350-2 drinking equipment & EN 14372 cutlery – utensils	Consumer Product Safety Act (S.C. 2010, c. 21), Toys Regulations (SOR/2011-17)	AS/NZS ISO 8124 Part 3
–	–	–	90 T ⁽²⁾	–
All materials including vulcanised rubber, silicone rubber, TPEs, glass, thermoplastics, all decorations	All materials including textiles (fabrics, strings, ribbons, etc.), decorations, metal parts, wooden parts, plastics	All materials including for EN 14350-2: vulcanised rubber, silicone rubber, TPEs, glass, thermoplastics for EN 14372: silicone rubber, TPEs, glass, ceramics, enamels, thermoplastics thermosetting plastics metal/alloys, wood	Surface coatings on toys	Toy materials other than modelling clay
mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)
60	60	15	1,000*	60
2.5	25	10	1,000*	25
200	1,000	100	1,000*	1,000
1.8	75	20	1,000*	75
50 (Cr)	60 (Cr)	10 (Cr)	–	60 (Cr)
–	–	–	–	–
2.5	90	25	90 T	90
10	60	10	Not Allowed	60
50	500	100	1,000*	500
1,430	–	–	–	–
1,600	–	–	–	–
14	–	–	–	–
830	–	–	–	–
300	–	–	–	–
100	–	–	–	–
6,000	–	–	–	–
20,000	–	–	–	–
–	–	–	–	–
5,000	–	–	–	–

(1) Toy Material Category 3: solid toy material with or without a coating which can be ingested as a result of biting, toothscraping, sucking or licking (e.g. paints, rubber, PVC, plush fabrics, steel, foam, leather)

(2) Consumer Product Safety Act (S.C. 2010, c. 21), Consumer Products Containing Lead (Contact with Mouth) Regulations, SOR/2010-273. Products other than kitchen utensils that are brought into contact with the user's mouth in the course of normal use; and products intended for use in play or learning by children under the age of three years.

(3) Still applicable to pushchairs; table-mounted seats, soother holders, playpens, changing units, safety barriers, baby carriers, baby walkers, reclined cradles, harnesses and reins, bouncer seats

(4) Already applicable to cots and folding cots, carrycots, cribs and cradles, high chairs and bicycle seats

SMALL CHILDCARE ARTICLES

MAIN SAFETY REQUIREMENTS (1/2)

REQUIREMENTS	SOOTHERS/PACIFIERS		SOOTHER HOLDERS
	US –16 CFR 1511 /ASTM F963	EUROPEAN – EN 1400+A1	EUROPEAN – EN 12586+A1
Construction	Guard/shield		At least one permanently attached fastener
	Dimension > Ø 42.7 mm template	Dimension > Ø 43 mm template	–
	Ventilation holes		Ventilation holes
	At least 2 Ø > 5 mm ≥ 5 mm from edge of shield	At least 2 Ø ≥ 4 mm but < 5.5 mm Area: ≥ 20 mm ² ≥ 15 mm apart ≥ 5 mm from edge of shield	At least 2 Ø ≥ 4 mm but < 5,5 mm Area ≥ 40 mm ² OR 1 ventilation hole Ø ≥ 12 mm or area ≥ 115 mm ²
	–	<ul style="list-style-type: none"> ■ Ring ≤ 35 mm Internal Ø ≥ 14 mm Width ≤ 1,4 length 	No adhesives or decals
	–	<ul style="list-style-type: none"> ■ Plug ■ Protrusion ≤ 3 mm 	<ul style="list-style-type: none"> ■ Strap ■ Length ≤ 220 mm ■ Any loop ≤ 110 mm ■ Width ≥ 6 mm
	Knob, plug or cover		Cord
	Protrusion ≤ 16 mm	Protrusion ≥ 10 mm and ≤ 16 mm	Thickness ≥ 1,5 mm
GENERAL REQUIREMENTS			
Structural integrity Pre-conditioning carried out	Teat (nipple)		5 impact 1 kg from 100 mm
	44.5N for 10 s	5 impact 1 kg from 100 mm	–
	All directions	90N for 10 s along axis	–
		<ul style="list-style-type: none"> ■ Teat (nipple) ■ Puncture > 30N 	Fastener: 1,000 cycles opening-closing
	Handle or ring	Teat (nipple)	Tensile force (all components)
	44.5N for 10 s All directions	Puncture + 90N for 10 s perpendicularly to axis	90N for 10 s All directions
		<ul style="list-style-type: none"> ■ Knob, plug and/or cover ■ Force 90N for 10 s 	–
	No small part released by test	<ul style="list-style-type: none"> ■ Elastomeric components ■ 50 cycles biting from 200N until 400N ■ 90N for 10 s perpendicularly to the axis 	–
	No ribbon, string, cord, etc., chain and the like shall be delivered	<ul style="list-style-type: none"> ■ All components ■ 90N for 10s 	–

FEEDING BOTTLES	DRINKING CUPS	CUTLERY AND FEEDING UTENSILS
EUROPEAN – EN 14350	EUROPEAN – EN 14350	EUROPEAN – EN 14372
Dimensions	Dimensions	Dimensions
No part shall enter the small parts cylinder		
Graduations		No hole between 5.5 and 12 mm
At least in 'ml' lowest ≤ 60 ml Gap ≤ 60 ml Highest = nominated max. measurable use	Not required If any, in 'ml' Gap ≤ 60 ml Highest = nominated max. measurable use	–
<ul style="list-style-type: none"> ■ Volumetric accuracy ■ Grad. ≥ 100 ml: ± 5 %; ■ Grad. < 100 ml: ± 5 ml 	<ul style="list-style-type: none"> ■ Volumetric accuracy ■ Grad. ≥ 100 ml: ± 5 %; ■ Grad. < 100 ml: ± 5 ml 	–
Sealing disc > 35 mm	–	–
–	Matched components and protrusions ≤ 100 mm	–
–	–	–
Teat		
Tensile force 90N for 10 s		
Puncture 200N for 10 s If punctured 90N for 10 s along major axis		All directions
–		–
Thermal shock: boiling water 10 min. then cold water 5 °C for 10 min.		Torque: 0,34 Nm
Retention test: teat on bottle	Retention test: teat on drinking cup	Components shore A < 60
60N for 10s at 45° from the axis	60N for 10s at 45° from the axis	Puncture 200N for 10 s If punctured 90N for 10 s along major axis
Print adhesion for marked graduations or decorations: cross-cut test		
–	–	Bending test 100 N for 10s
–	–	–

SMALL CHILDCARE ARTICLES

MAIN SAFETY REQUIREMENTS (2/2)

REQUIREMENTS	SOOTHERS/PACIFIERS		SOOTHER HOLDERS
	US –16 CFR 1511 /ASTM F963	EUROPEAN – EN 1400+A1	EUROPEAN – EN 12586+A1
CHEMICAL REQUIREMENTS			
Migration of heavy metals	See detailed table on page 12	See detailed table on pages 12-13	See detailed table on pages 12-13
N-Nitrosamines and N-Nitrosatable substances (release)	ASTM F1313 – Mandatory requirement per ASTM F963	≤ 0.01 mg/kg (N-Nitrosamines) ≤ 0.1 mg/kg (N-Nitrosatables)	–
2-Mercaptobenzothiazole (MBT) (release)	–	≤ 8 mg/kg	–
Antioxidants (release)	–	≤ 0.3125 mg/l (BHT) BHT 2,6-bis-(1,1-dimethylethyl)-4-methylphenol ≤ 0.0625 mg/l (sum of Cyanox 425 and Antioxidant 2246) Cyanox 425 2,2'-Methylenebis (4-ethyl-6-tert-butylphenol) Antioxidant 2246 2,2'-Methylenebis (6-(1,1-dimethylethyl)-4-methylphenol) ≤ 0.25 mg/l (Wingstay L) Wingstay L Butylated reaction product of p-cresol & dicyclopentadiene ≤ 0.25 mg/l (sum of Irganox 1520 and Irganox 1726) Irganox 1520 2,4-bis(octylthiomethyl)-6-methylphenol Irganox 1726 2,4-bis-(dodecylthiomethyl)-6-methylphenol	–
Formaldehyde	–	≤ 0.375 mg/L	≤ 30 mg/kg (textiles) ≤ 80 mg/kg (wood)
Bisphenol A (release)	–	≤ 0.125 mg/L	≤ 0.1 mg/l (as monomers)
Volatile compound content (VOC)	–	≤ 0.5 % (m/m)	–
Nickel (migration)	–	–	≤ 0.5 $\mu\text{g}/\text{cm}^2/\text{week}$
Primary aromatic amines	–	–	Action Limit
Wood preservatives	–	–	Action Limit
Monomers	–	–	Action Limit (acrylamide) ≤ 0.1 mg/l (BPA) ≤ 2.5 mg/l (formaldehyde) ≤ 15 mg/l (phenol) ≤ 0.75 mg/l (styrene)
Colourants	–	–	Action Limit
Phthalates	–	–	≤ 0.1 % (sum of BBP, DBP, DEHP, DIDP, DINP and DNOP)

Table 6

FEEDING BOTTLES	DRINKING CUPS	CUTLERY AND FEEDING UTENSILS
EUROPEAN – EN 14350	EUROPEAN – EN 14350	EUROPEAN – EN 14372
See detailed table on pages 12-13	See detailed table on pages 12-13	See detailed table on pages 12-13
≤ 0.01 mg/kg (N-Nitrosamines)	≤ 0.01 mg/kg (N-Nitrosamines)	–
≤ 0.1 mg/kg (N-Nitrosatables)	≤ 0.1 mg/kg (N-Nitrosatables)	–
≤ 8 mg/kg	≤ 8 mg/kg	–
≤ 30 µg/100 mL or 60 µg/dm ² (BHT) BHT 2,6-bis(1,1-dimethylethyl)-4-methylphenol	≤ 30 µg/100 mL or 60 µg/dm ² (BHT) BHT 2,6-bis(1,1-dimethylethyl)-4-methylphenol	–
≤ 15 µg/100 mL or 30 µg/dm ² (Antioxidant 2246) Antioxidant 2246 2,2'-Methylenebis(6-(1,1-dimethylethyl)-4-methylphenol)	≤ 15 µg/100 mL or 30 µg/dm ² (Antioxidant 2246) Antioxidant 2246 2,2'-Methylenebis(6-(1,1-dimethylethyl)-4-methylphenol)	–
–	–	≤ 15 mg/kg
≤ 0.03 µg/mL	≤ 0.03 µg/mL	≤ 0.03 µg/mL
≤ 0.5 % (m/m)	≤ 0.5 % (m/m)	≤ 0.5 % (m/m)
–	–	≤ 0.5 µg/cm ² /week
–	–	–
–	–	–
–	–	–
–	–	–
–	–	≤ 0.1 % (sum of BBP, DBP, DEHP, DIDP, DINP and DNOP)

TOYS

SUMMARY OF INTERNATIONAL SAFETY STANDARDS & REGULATIONS

REQUIREMENT	USA	EUROPE	CANADA
Mechanical & Physical Test	CPCSC & ASTM F963-11	EN 71 Part 1	Canada Consumer Product Safety Act (CCPSA) Toys Regulations (SOR/2011-17)
Flammability Test (Textile Material/Pile Fabric/Pile Materials)	<ul style="list-style-type: none"> ■ 16 CFR 1610 ■ ASTM F963-11 A.6 	EN 71 Part 2	Canada Consumer Product Safety Act (CCPSA) Toys Regulations (SOR/2011-17)
Flammability Test (Solid Material/Toy Products)	<ul style="list-style-type: none"> ■ 16 CFR 1500.44 ■ ASTM F963-11 A.5 	EN 71 Part 2	Canada Consumer Product Safety Act (CCPSA) Toys Regulations (SOR/2011-17)
Toxic Element Test (Heavy Metal Analysis)	<ul style="list-style-type: none"> ■ CPSIA Sect 101 Lead in substrates ■ CPSIA Sect 101 Lead in paint (16 CFR 1303) ■ ASTM F963-11 4.3.5 Soluble Heavy Metals (incl. A10.10) 	EN 71 Part 3	Canada Consumer Product Safety Act (CCPSA) Toys Regulations (SOR/2011-17)
Cleanliness of Stuffing Material	<ul style="list-style-type: none"> ■ ASTM F963-11 ■ AOAC Ch 16 ■ Pennsylvania Stuffed Toys Act ■ Massachusetts Law on Stuffed Toys ■ Ohio Regulations ■ Maine Regulations 	EN 71 Part 1	<ul style="list-style-type: none"> ■ Canada Consumer Product Safety Act (CCPSA) Toys Regulations (SOR/2011-17) ■ The upholstered and stuffed articles act
Phthalates	<ul style="list-style-type: none"> ■ CPSIA (BBP, DBP, DEHP, DIDP, DINP and DNOP) ■ California Prop 65 (BBP, DBP, DEHP, DIDP, DINP and DnHP) ■ Washington RCW Chapter 70.240 (Children's Safe Products Act, CSPSA) (BBP, DBP, DEHP, DIDP, DINP and DNOP) 	REACH Annex XVII (BBP, DBP, DEHP, DIDP, DINP and DNOP)	Canada Consumer Product Safety Act (CCPSA) Phthalates Regulations (SOR/2016-188) (BBP, DBP, DEHP, DIDP, DINP and DNOP)
Azo colourants and Azo Dyes	-	REACH Annex XVII	-
Cadmium	<ul style="list-style-type: none"> ■ ASTM F963-11 ■ Washington Children's Safe Products Act (CSPA) 	REACH Annex XVII	-
Nickel	-	REACH Annex XVII	-
Battery-Operated Toy Safety Test	ASTM F963-11 Section 4.25	EN 62115	-
Electrically Operated Toys	16 CFR 1505	EN 62115	-
Hazardous Substances in battery-operated/electrical toys	-	RoHS II (Directive 2011/65/EU)	-
Electromagnetic Compatibility for battery-operated/electrical toys	-	Directive 2014/30/EC (EMC Recast)	ICES Interference-Causing Equipment Standard
Radio-Controlled Frequency Requirements	FCC Part 15 Radio Frequency Devices	Directive 2014/53/EU (Radio Equipment Directive, RED)	RSS Radio Standards Specifications

Table 7 * Ordinance No. 99/2016 (1,4-butanediol) – Brazil Bans Certain Toys Containing 1, 4-Butanediol ([click here to read the article](#)).

AUSTRALIA	INTERNATIONAL	JAPAN	CHINA	BRAZIL*
AS/NZS ISO 8124 Part 1	ISO 8124 Part 1	ST Part 1	<ul style="list-style-type: none"> ■ GB 6675.2 ■ GB 5296.5 	NM 300-1
AS/NZS ISO 8124 Part 2	ISO 8124 Part 2	ST Part 2	GB 6675.3	NM 300-2
AS/NZS ISO 8124 Part 2	ISO 8124 Part 2	ST Part 2	GB 6675.3	NM 300-2
AS/NZS ISO 8124 Part 3	ISO 8124 Part 3	ST Part 3	<ul style="list-style-type: none"> ■ GB 6675.1 ■ GB 24613 (coating on toys) 	NM 300-3
AS/NZS ISO 8124 Part 1	ISO 8124 Part 1	ST Part 1	GB 6675.2	NM 300-1
Consumer Protection Notice No. 6 of 2010, Trade Practices Act 1974 (Competition and Consumer Act 2010, CCA)	ISO 8124 Part 6	<ul style="list-style-type: none"> ■ ST Part 3 ■ Japan Food Sanitation Law (JFSL) 	<ul style="list-style-type: none"> ■ GB 24613 (coating on toys) ■ GB 6675.1 	Ordinance 369 and Microbiological tests Pharmacopea USP No. 28/2005
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
AS/NZS 62115	IEC 62115	ST Part 1	GB 19865	NM 300-6
AS/NZS 62115	IEC 62115	-	GB 19865	NM 300-6
-	-	-	Order No. 32 of 21 January 2016 China RoHS II	-
Electromagnetic Compatibility (EMC) Regulations, C-Tick Mark	CISPR14 Part 1 & Part 2	Voluntary Control Council For Interference by Information Technology Equipment	-	-
Electromagnetic Compatibility (EMC) Regulations, C-Tick Mark	-	Voluntary Control Council For Interference by Information Technology Equipment	-	-

MEETING SAFETY REGULATIONS IN EUROPE

CEN DEFINITION OF CHILDCARE ARTICLES:

- Any product designed or obviously intended to safely ensure and facilitate seating, bathing, changing and general body care, feeding, sleeping, transportation and protection for young children
- Childcare articles are intended to be used with children up to 4 years

FRAME OF MAIN REGULATION (OTHER THAN REGULATION ON CHEMICALS LIST)


REGULATION	GENERAL PRODUCTS SAFETY DIRECTIVE 2001/95/EC	FRENCH DECREE 91-1292 ON THE PREVENTION OF RISKS DUE TO THE USE OF CHILDCARE ARTICLES	BRITISH FURNITURE AND FURNISHING (FIRE) REGULATION NO. 1324 AND AMENDMENT NO. 2358
Scope	All consumer products	Childcare articles defined in the decree as follows: products intended to ensure or facilitate seating, washing, sleeping, transport, movement and physical protection of children less than 4 years	Mattresses and cushions, padded juvenile products such as products intended for seating or transportation; cots, etc. such as more generally defined furnishing products
Requirements	Products placed on the European market shall be safe	Products placed on the French market shall meet the safety requirements listed in Annex of the Decree	Products listed in the regulation shall meet the flammability properties required for coverings and padding when tested with a cigarette and a match
Application	Compliance with national or European relevant standards, Commission recommendations, product safety code of good practice, reasonable consumer expectations concerning safety	Compliance with safety requirements, and with relevant European Standards when published Type examination	Testing in accordance with relevant British standards
Product information	Suitable product information and warnings shall be given	Adequate product information shall be given	Warnings (Caution) to be attached as labels
Mark	—	‘Conforme aux exigences de sécurité’	Labelling 

Table 8

TYPE EXAMINATION – FRENCH DECREE 91-1292

- Conducted by an organisation that is recognised by the French Ministry of Industry
- Certificate of Conformity delivered after type examination procedure

REQUIREMENTS OF THE DECREE	CONDITIONS FOR APPLICATION
<ul style="list-style-type: none"> ■ General principles <ul style="list-style-type: none"> ● Protection of user during normal or foreseeable use ● Product information ■ Mechanical and physical properties <ul style="list-style-type: none"> ● Stability and strength ● Sharp edges and points, moving parts, assemblies ● Locking mechanisms and safety devices ● Small parts ● Child restraint systems ■ Flammability <ul style="list-style-type: none"> ● Low flame propagation speed ■ Chemical properties <ul style="list-style-type: none"> ● Ingestion, inhalation, skin contact ● Toxic fumes ■ Hygiene <ul style="list-style-type: none"> ● Migration of heavy metals 	<ul style="list-style-type: none"> ■ There is no applicable standard published ■ A standard exists, that is not published to the French Official Journal: this may be a French or European standard ■ The product presents an additional function, which is not covered by its applicable standard, or by any other standards published ■ Combination of 2 products creates a risk or a characteristic that is not covered by applicable standards ■ Even if covered by an applicable standard, the product presents a risk
PROCESS	VALIDITY
<ul style="list-style-type: none"> ■ Product <ul style="list-style-type: none"> ● Review of regulation ● Study of accident data ● Research on applicable documents ■ Protocol <ul style="list-style-type: none"> ● Rationale of type examination procedure ● Risk analysis ● Test programme ■ Client review/Approval by the applicant ■ Documents issue <ul style="list-style-type: none"> ● Type examination report ● Certificate of Conformity to the safety requirements 	<ul style="list-style-type: none"> ■ Type examination is delivered on 1 model ■ Manufacturer or importer or distributor is responsible for the compliance of all products put on the market ■ Regular update of the technical documentation is necessary ■ Type examination is no longer valid if: <ul style="list-style-type: none"> ● Knowledge of accidents, new requirements, recalls, etc. exist ● Any change is made on the product by the manufacturer ● A standard is published

Table 9

MEETING REGULATORY STANDARDS IN THE U.S. WITH JPMA

With increasing regulatory scrutiny of juvenile products, the Juvenile Products Manufacturers Association (JPMA) created a new protocol for testing that can help save companies time and money when introducing products to retail locations.

The JPMA Certification Program 2.0 is based on conformance with ASTM standards, Federal Regulations (e.g. CFR and CPSIA) and individual state requirements, as well as some popular retailer requirements.

The JPMA has appointed SGS as the Principal Laboratory and Program Administrator due to its expertise and experience in quality, compliance and safety in the global child care products industry.

Benefits for retailers, manufacturers and importers:

- Appeals to both small and large manufactures as well as retailers
- Reduces testing duplication – with JPMA you can fulfil multiple retailer requirements with one testing program, saving time and money
- Increases confidence for both consumers and retailers through third-party testing
- Offers a more logical flow of testing in addition to being more comprehensive
- Sets the bar for what is accepted by government and retailers



THE JPMA PROGRAM INCLUDES A FOCUS ON UPSTREAM TESTING IN MANUFACTURING AND PRE-MARKET CERTIFICATION OF CHILDREN’S PRODUCTS IN 26 DIFFERENT CATEGORIES.

- Bassinets & cradles
- Bedside sleepers
- Booster seats
- Carriages & strollers
- Changing tables
- Children’s chairs and stools
- Expansion gates & expendable enclosures
- Full-size baby cribs
- Hand-Held infant carriers
- High chairs
- Infant bath seats & infant bathtubs
- Infant bouncer seats
- Infant swings
- Infant walkers
- Infant and toddler rockers
- Infant inclined sleep products
- Play yards & nonfull-size cribs
- Portable bed rails
- Portable hook-on chairs
- Soft infant carriers, frame child carriers & infant sling carriers
- Stationary activity centres
- Toddler beds
- Toys

LABELLING FOR THE US MARKET

TRACKING-LABEL REQUIREMENTS FOR CHILDREN'S PRODUCTS

Children's products, including juvenile products, designed or intended primarily for children up to the age of 12 are obliged by law (Section 103 of CPSIA) to have 'distinguishing permanent marks' (commonly referred to as 'tracking labels') on the product and its packaging, to the extent practicable, to enable the manufacturer to ascertain the specific source of the product. These requirements have been effective since August 2009.

The US manufacturer for products manufactured domestically and the importer for products manufactured overseas are responsible for compliance with the tracking-label requirements. Importers should work with their overseas manufacturers to ensure compliance.

The information on the tracking label should be visible and legible and must contain certain information, including:

- The name of the manufacturer or private labeller
- The location and date of manufacture of the product
 - The names of the city and country where the product was manufactured are sufficient
 - The date of production could be a range of dates
 - The date of manufacture for a group of disparate components or items assembled together or gathered into one package is the date of assembly or placement.
- Cohort information, such as the batch number, run number or other identifying characteristics
- Any other information to facilitate ascertaining the specific source of the product

The law requires the 'permanent' mark, to the extent practical, on both the product and its packaging. The 'permanent' mark on the product can reasonably be expected to remain on the product during the useful life of the product. A mark is not required to be placed on the packaging if it is visible on the product through disposable packaging. The required information already permanently marked either to brand the product or otherwise to comply with other Commission or federal regulation (e.g. Textile, Wool and Fur Act or country of origin labelling rules) could be considered as part of the 'distinguishing marks'.

The use of adhesive labels is allowed provided such labels are permanent and maintain their integrity throughout the product's life span. The use of hangtags and adhesive labels, however, is not regarded as permanent.

In the event that it is not practical to affix the tracking label to the product, it may still be practical to affix the tracking label information to the packaging of the product. In situations where it is not practical for tracking labels to be printed on small products without individual packaging, markings should be on the package or carton in which the products are shipped to the retailer. The mark can also be in the form of a code and website address provided the ascertainable information required (name of manufacturer, importer or private labeller) is also identified so that the required information can be obtained when the manufacturer, importer or private labeller is contacted.

References: <http://www.cpsc.gov/PageFiles/126760/sect103policy.pdf>
<http://www.cpsc.gov/en/Business-Manufacturing/Business-Education/tracking-label/>

16 CFR 1130: CONSUMER REGISTRATION OF DURABLE INFANT OR TODDLER PRODUCTS

The rule applies to the following product categories:

- Bassinets and cradles
- Bath seats
- Booster chairs
- Changing tables
- Children's chairs and stools
- Full-size cribs
- Gates and other enclosures for confining a child
- High chairs
- Hook-on chairs
- Infant bathtubs
- Infant bouncers
- Infant carriers
- Infant slings
- Non-full-size cribs
- Play yards
- Portable toddler bed rails
- Toddler beds
- Stationary activity centres
- Strollers
- Swings
- Walkers

In order to improve recall effectiveness, manufacturers of covered products are required to:

- Provide consumers with a postage-paid consumer registration form with each product
- Maintain a record of the names, addresses, e-mail addresses, and other contact information of consumers who register their products
- Permanently place the manufacturer's name and contact information, model name and number, and the date of manufacture on each durable infant or toddler product

The domestic manufacturer or the importer (of foreign-made products) is responsible for compliance. The importer is responsible for complying with all the requirements in the rule since non-US manufacturers are considered as importers.



US FORMALDEHYDE STANDARDS FOR COMPOSITE WOOD PRODUCTS

In July 2010, President Obama signed a landmark legislation, the 'Formaldehyde Standards for Composite Wood Products Act' (S 1660, 2010) as law. The Act amends the Toxic Substances Control Act (TSCA) Title VI by establishing formaldehyde emission limits for composite wood products: Hardwood Plywood (HWPW), medium density-fibreboard (MDF) and Particleboard (PB). These limits are identical to the Phase II limits for HWPW, MDF and PB under the California Air Resources Board (CARB). The law directs the U.S. Environmental Protection Agency (EPA) to finalise a rule on implementing and enforcing a number of provisions relating to composite wood products.

On 27 July 2016, the EPA finalised a final rule to implement the Formaldehyde Standards for Composite Wood Products Act. The Final Rule has not been published in the Federal Register at the time of this article submitted for publication. According to the prepublication copy of the EPA document, the Final Rule contains provisions relating to:

- Auditing and reporting of third-party certifiers
- Chain of custody of requirements
- Enforcement
- Exceptions to products containing de minimis quantities of composite wood products
- Finished goods
- Labelling
- Laminated products
- No-added formaldehyde-based resins
- Record-keeping
- Sell-through provisions
- Third-party testing and certification
- Ultra low-emitting formaldehyde resins

The formaldehyde emissions standards will become effective one year after publication of the Final Rule. From this date, composite wood products that are compliant with the law will be required to be labelled as 'TSCA Title VI Compliant'. Panels that are certified by a CARB-approved Third Party Certifier (TPC) are considered as certified under TSCA Title VI for 2 years from the date of publication of the Final Rule. After this initial 2-year period, the product remains certified if the CARB-approved TPC is recognised as an EPA TSCA Title VI TPC.

CALIFORNIA AIRBORNE TOXIC CONTROL MEASURE (ATCM) TO REDUCE FORMALDEHYDE EMISSIONS FROM COMPOSITE WOOD PRODUCTS

In April 2007, the California Air Resources Board (CARB) approved the Airborne Toxic Control Measure (ATCM) to regulate formaldehyde emission requirements in composite wood products; a general term for wood-based panels manufactured from wood pieces, particles or fibres bonded together with resins. The emitted formaldehyde is due to unreacted formaldehyde released from urea-formaldehyde resins.

The specific composite wood products are:

- i.** Hardwood plywood (HWPW). This applies to HWPW with a veneer core (HWPW-VC) or with a composite core (HWPW-CC)
- ii.** Particleboard (PB)
- iii.** Medium density fibreboard (MDF) including thin MDF (≤ 8 mm thick)

The ATCM applies to panel manufacturers, distributors, fabricators, importers and retailers of products manufactured from HWPW, PB and MDF destined for California. To be compliant with the regulation, panel manufacturers of HWPW, PB and MDF must be certified by a third party certifier approved by CARB. Such panel manufacturers must label their products to demonstrate that their products comply with the formaldehyde emission standards by means of invoices or bills of lading stating as such.

Fabricators who use compliant panels must label their finished products as being manufactured from compliant panels. The label can be applied as a stamp, tag, sticker or bar code on every finished product or on every box containing the finished products. Distributors, importers and fabricators are also required to provide documentation to their customers (retailers) to demonstrate that their products are compliant.

The labelling requirements for manufacturers, fabricators, distributors, importers and retailers of composite wood products are summarised in Table 11.

LABEL	PARTY		
	MANUFACTURER	FABRICATOR	DISTRIBUTOR/ IMPORTER/RETAILER
Minimum information	<ul style="list-style-type: none"> ■ Name ■ Product lot number or batch number ■ CARB assigned number for third-party certifier ■ Statement of compliance 	<ul style="list-style-type: none"> ■ Name ■ Date finished product produced (mm/yyyy) ■ Statement of compliance 	<ul style="list-style-type: none"> ■ No additional labelling ■ Distributor/Importer requires labelling if finished products are modified
Other recommendations	<ul style="list-style-type: none"> ■ Label each panel ■ Statement of compliance to the word 'California' or CARB, section 93120, and applicable compliance Phase ■ Date of manufacture (dd/mm/yyyy) 	<ul style="list-style-type: none"> ■ Label both finished goods and box containing finished goods ■ Statement of compliance to contain the word 'California' or CARB, section 93120 	
Example of label	<ul style="list-style-type: none"> ■ Company ABC ■ Lot number 2, 02/06/2013 ■ California 93120 compliant for formaldehyde Phase 2 ■ TPC_ _ 	<ul style="list-style-type: none"> ■ Company ABC 02/2013 ■ California 93120 compliant for formaldehyde 	

Table 11

Reference: <http://www.arb.ca.gov/toxics/compwood/compwood.htm>

CALIFORNIA PROPOSITION 65 (PROP 65)

Prop 65 is the 'Safe Drinking Water and Toxic Enforcement Act' of 1986, a ballot initiative passed overwhelmingly by California residents in November 1986. It is intended to protect California citizens and the state's drinking water sources from chemicals known to cause cancer, birth defects or other reproductive harm, and to inform citizens about exposures to such chemicals.

Prop 65 requires the state to publish a list of chemicals known to cause cancer or birth defects or other reproductive harm at least on an annual basis. It also requires businesses to provide a 'clear and reasonable' warning before knowingly and intentionally exposing anyone to a listed chemical. The route of exposure can be environmental, occupational, via drinking water or from consumer products such as juvenile products. The warning can be provided by a number of means such as by labelling on consumer products or posting signs at the workplace.

Examples of warnings can be those in Table 10.

EXAMPLES OF WARNING	
1	2
WARNING: This product contains a chemical known to the State of California to cause cancer	WARNING: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm

Table 10

Once a chemical is listed, businesses have 20 months to comply with the discharge prohibition and 12 months to provide a 'clear and reasonable warning'. Over the years, products containing lead, phthalates and flame retardants have been consistently targeted. Consumer products containing cadmium have also been increasingly targeted.

Businesses with less than 10 employees and government agencies are exempted from Prop 65 warning requirements. Warning requirements are also not required if the exposures that are caused by businesses create no significant risk of cancer, birth defects or other reproductive harm.

Reference: <http://oehha.ca.gov/proposition-65/general-info/proposition-65-plain-language>

PACKAGING MATERIALS FOR JUVENILE PRODUCTS

EUROPEAN UNION

In 1994, the European Union (EU) adopted the packaging and packaging waste Directive 94/62/EC^[1] to:

- I. Prevent or reduce the impact of packaging and packaging waste to the environment
- II. Reduce the quantity of packaging waste for final disposal through reuse, recycling and other forms of recovery

The Directive has 3 main packaging categories:

- I. Primary or sales packaging
- II. Secondary or grouped packaging
- III. Tertiary or transport packaging

Packaging materials are obliged to fulfil the concentration limit for 4 heavy metals (cadmium, chromium (VI), lead and mercury) under the Packaging Directive. Packaging is usually considered as an article under REACH and is obliged to comply with provisions for articles, such as substances of very high concern (SVHCs) on the Candidate List (Table 12). Packaging with different functions (primary, secondary or tertiary packaging) is considered separately^[2].

UNITED STATES

In the US, the Toxics in Packaging Clearinghouse (TPCH) was formed in 1992 to promote the Model Toxics in Packaging Legislation [3]. This legislation, modelled on the European Directive 94/62/EC, was developed in 1989 to reduce the quantity of cadmium, chromium (VI), lead and mercury to no more than 100 ppm in packaging and packaging components. The legislation has been adopted by 19 states:

California, Connecticut, Florida, Georgia, Illinois, Iowa, Maine, Maryland, Minnesota, Missouri, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, Washington and Wisconsin.

CERTIFICATE OF COMPLIANCE (COC)

In the Model Legislation, a manufacturer or supplier of packaging components must, upon request, furnish a COC to its customers stating that a packaging component or packaging material is in compliance with the requirements. This provision does not apply to the retailer or consumer, only to companies whose products are in the package. A signed copy of the COC must be kept as long as the package or packaging component is in use.

JURISDICTION	SUBSTANCE	SCOPE	REQUIREMENT
EU and US	<ul style="list-style-type: none"> ■ Cadmium ■ Chromium (VI) ■ Lead ■ Mercury 	Packaging materials	≤ 100 mg/kg (sum)
EU	SVHCs on Candidate List	Articles, including packaging materials	≤ 0.1 % (threshold limit for communication in supply chain, Article 33)

Table 12

OTHER INTERNATIONAL STANDARDS ON CHEMICAL REQUIREMENTS FOR PACKAGING

CHINA

- GB/T 16716.1-2008 'Packaging and packaging waste – Part 1: General Rules of Disposal and Utilization

^[1] http://ec.europa.eu/environment/waste/packaging/index_en.htm

^[2] http://echa.europa.eu/documents/10162/13632/articles_en.pdf

^[3] <http://www.toxicsinpackaging.org/>

MEETING SAFETY REGULATIONS IN BRAZIL

Compulsory certification is required for the following products:

PRODUCT	REGULATION	STANDARD	REGULATORY AGENCY
Baby bottles and nipples	Settlement 35/2009 and RDC 221	NBR 13793	Inmetro Anvisa
Baby strollers	Settlement 351/2012 Ordinance 315	NBR 14389	Inmetro
Child cots and folding cots	Settlement 269/2011 Ordinances 243, 594 and 53	NBR 15860-1 NBR 15860-2	Inmetro
High chairs	Settlement 51/2013 Ordinance 683/2012	NBR 15991-1 NBR 15991-2	Inmetro
Mattresses	Settlement 79/2011	NBR 13579-1 NBR 13579-2	Inmetro
Pacifiers/Soothers	Settlement 34/2009	NBR 10334	Inmetro Anvisa
School articles	Settlement 481/2010	NBR 15236	Inmetro
Toys	Settlement 321/2009	ABNT NM 300	Inmetro

Table 13

This document contains guidance on juvenile products testing for the Quality Assurance industry. Its content is subject to changes due to new market requirements. Users are reminded that legislation is the only authentic legal reference information and that information in this document does not constitute legal, technical or other professional advice. SGS does not accept any liability with regard to the contents of this document. For latest updates, please refer to SGS regulatory bulletins SafeGuards written by SGS experts and subscribe for free at www.sgs.com/ConsumerSubscribe or contact your local SGS technical team. SGS reserves the right to change the contents of this document without notice.



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